

**To:** Hinkle, Vanessa[Hinkle.Vanessa@epa.gov]  
**From:** Russ, Timothy  
**Sent:** Tue 9/17/2013 2:51:01 PM  
**Subject:** RE: Conf. Room for General Conformity call with BLM/WDEQ; 2:00pm to 3:30 pm today - Coneflower on 7th floor

Hi Vanessa,

Actually ... the call was yesterday afternoon (Mon.) at 2:00pm. Scott, Suzanne, and I attended for EPA; BLM had Charis from the State office plus a couple of field office folks and two people from WDEQ.

**For the exemption list:**

1.) We had a discussion about the non-oil and gas activities and asked BLM to provide further information. **Ex. 5 - Deliberative Process** there were no numbers of activities or emissions to document the BLM's exemption for categories that would say for example "infrequent use of single vehicle". BLM felt further information was unnecessary, but finally agreed they would look at historical data from the Pinedale Office to come up with an estimated number of activities per year per category with emissions estimates for these types of categories.

2.) General Conformity Permit Exemption Issue: With regard to the oil and gas categories, BLM flatly stated that any equipment or activity's emissions would be excluded, from a general conformity analysis, that had a WDEQ-issued permit. Scott asked Charis if she had reviewed our comments, as provided in his email of last Wed. and which Suzanne had sent previously, that stated our concerns that this particular exemption for NSR/PSD permitted minor and/or major sources only applied to stationary sources. At that point, BLM deferred to WDEQ (Darla Potter) who went into a discussion on how these permits (both for stationary sources and temporary sources/activities) were based on WAQSR Chapter 6 for NSR and have helped reduce emissions in the UGRB. We brought up the continuing issue of permits for drill rigs, as an example, and how these are temporary, non-stationary sources and would not be applicable for the general conformity exemption. This led to WDEQ stating there was an ongoing difference of opinion between EPA and WDEQ on this issue and that the permits were issued by WDEQ's delegated authority and as per the CAA. Scott defused this by stating that we were not saying that we had an issue with the State's delegated permit program, but (and circling back) that these types of temporary sources/activities did not meet the definition of a stationary source for the general conformity permit exemption. We asked that BLM provide us with a list of what they consider "equipment and activities" that they believed met the general conformity permit exemption.

BLM indicated they would defer to the State to develop such a list for forwarding to EPA (no time frame for this). In the end, WDEQ (Darla) stated she would be raising this general conformity permitting exemption issue to her director and to the director of WDEQ. That's how we ended the call.

After the call, for the Air Program, Scott advised Carl Daly of these developments.

Please let me know if you have any questions.

Thanks!

Tim

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**From:** Hinkle, Vanessa  
**Sent:** Monday, September 16, 2013 4:07 PM  
**To:** Russ, Timothy  
**Subject:** RE: Conf. Room for General Conformity call with BLM/WDEQ; 2:00pm to 3:30 pm today - Coneflower on 7th floor

Thanks, Tim. I will need to call in for tomorrow's call. Is there a call in number?

Vanessa

**From:** Russ, Timothy  
**Sent:** Monday, September 16, 2013 10:44 AM  
**To:** Jackson, Scott; Bohan, Suzanne; Hinkle, Vanessa  
**Subject:** Conf. Room for General Conformity call with BLM/WDEQ; 2:00pm to 3:30 pm today - Coneflower on 7th floor

Hi Folks,

We'll be in the Coneflower room for our 2:00 pm call with the BLM and WDEQ.

Thanks!

Tim

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**From:** R8LOTUSI/R8/USEPA/US [<mailto:R8LOTUSI/R8/USEPA/US@epamail.epa.gov>]  
**Sent:** Monday, September 16, 2013 10:40 AM  
**To:** Russ, Timothy  
**Cc:** Russ, Timothy  
**Subject:** Please confirm that your recent conference room request is booked on the central calendar. Re-book the appointment if does not appear.09/16/2013

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Start Time: 09/16/2013 02:00:00 PM  
End Time: 09/16/2013 03:30:00 PM  
Purpose: BLM/WDEQ-Gen. Conf.

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